REMARKS

This Application has been carefully reviewed in light of the final Office Action mailed June 2, 2008. Claims 1-10 are pending and rejected in this Application. Applicants amend Claims 1 and 7-8 and respectfully request reconsideration and favorable action in this case in view of the following remarks.

Claim Objections

Claims 1 and 8 are objected to because of informalities. With regard to Claim 8, the Office Action contends that the phrase "the at least one business entity object" is repeated twice. Applicants amend Claim 8 accordingly.

With regard to Claim 1, the Office Action contends that the language "'operable to' . . . should be changed to, 'the processor configured to' to show that the processor is actually programmed to carry out the recited functions." *Office Action*, pg. 2. The Examiner provides no support in case law or statutes to suggest that use of the phrase "operable to" is an appropriate ground for objecting to a claim. While the Examiner suggests that the breadth of the claim is the basis for the rejection, Applicant respectfully reminds the Examiner that:

> Breadth of a claim is not to be equated with indefiniteness. If the scope of the subject matter embraced by the claims is clear, and if applicants have not otherwise indicated that they intend the invention to be of a scope different from that defined in the claims, then the claims comply with 35 U.S.C. 112, second paragraph.

M.P.E.P. § 2173.04 (citation omitted).

Furthermore, an informal search of the USPTO's website returns over 160,000 issued patents with claims reciting the phrase "operable to." In short, use of the phrase "operable to" in claims is a practice that is both well accepted and currently supported by the PTO. To the extent that the Examiner intends to maintain this objection, Applicants respectfully request the Examiner to provide support from applicable authority, such as case law or statutes.

Section 101 Rejections

The Office Action rejects Claims 1-6 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Specifically, the Office Action alleges that "[t]he claims represent

an abstract idea, directed solely to non-functional descriptive material." *See Office Action*, pg. 3. Applicants respectfully traverse these rejections.

Amended Claim 1 discloses a Web Services Directory comprising a computer-readable medium and a processor operable to execute a program of instructions encoded on the computer-readable medium. The program of instructions comprises at least one Business Entity object and at least one User object. The at least one Business Entity object is arranged under the at least one User object. The at least one User object comprises security information defining what objects a user has access to, and the at least one User object grants access to the user based on the security information.

Accordingly, Applicants respectfully contend that Claim 1 does impart functionality. Under M.P.E.P. § 2106.01(I), "[a] claimed computer-readable medium encoded with a computer program is a computer element which defines structural and functional interrelationships between the computer program and the rest of the computer which permit the computer program's functionality to be realized, and is thus statutory." Therefore, Applicants respectfully submit that Claim 1 recites patentable subject matter. Claims 2-6 each depend, directly or indirectly, from Claim 1 and therefore recite patentable subject matter. Thus, Applicants respectfully request that the rejections of Claims 1-6 under 35 U.S.C. § 101 be withdrawn.

Section 102 Rejections

The Office Action rejects Claims 1-7 under 35 U.S.C. § 102(e) as being anticipated by *Gadbois*. Applicants respectfully traverse these rejections for the reasons below.

Amended Claim 1 discloses a Web Services Directory comprising a computer-readable medium and a processor operable to execute a program of instructions encoded on the computer-readable medium. The program of instructions comprises at least one Business Entity object and at least one User object. The at least one Business Entity object is arranged under the at least one User object. The at least one User object comprises security information defining what objects a user has access to, and the at least one User object grants access to the user based on the security information.

In order to anticipate a claim, a reference must disclose each and every limitation of that claim. M.P.E.P. § 2131. Applicants respectfully contend that *Gadbois* fails to disclose each and every limitation of Claim 1. The Office Action contends that Organization1 222

and Organization2 224 of FIGURE 2 of *Gadbois* are User objects as defined by Claim 1. *Office Action*, pg. 4. *Gadbois* also discloses an access system 180 that allows a user to access a registry server. *Gadbois*, ¶ 0022. However, the cited portions of *Gadbois* fail to disclose either Organization1 222 or Organization2 224 comprising security information defining what objects a user has access to. Furthermore, the cited portions fail to disclose either Organization1 222 or Organization2 224 granting access to a user based on this security information. For at least these reasons, Applicants respectfully contend that Claim 1 is patentably distinguishable from *Gadbois*.

Claims 2-6 each depend from Claim 1. Therefore, Applicants respectfully submit that Claims 2-6 are patentably distinguishable from *Gadbois* for at least the same reasons discussed above with regard to Claim 1.

Similar to Claim 1, Claim 7 also recites "the at least one User object comprises security information defining what objects a user has access to" and "the at least one User object grants access to the user based on the security information." Therefore, Applicants respectfully submit that Claim 7 is patentably distinguishable from *Gadbois* for at least the same reasons discussed above with regard to Claim 1.

Section 103 Rejections

The Office Action rejects Claims 8-10 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 7,114,154 to Crohn ("*Crohn*") in view of *Gadbois*. Applicants respectfully traverse these rejections for the reasons listed below.

Claim 8 is directed to a Web Services system that includes a registry in which businesses may register. The registry includes a hierarchical directory including at least one Domain object, at least one User object, and at least one Business Entity object. The at least one Domain object includes a directory prefix name, and the at least one Domain object is a root object of the hierarchical directory. The at least one User object identifies a user account for managing the at least one Business Entity object arranged under the at least one User object. The at least one User object is arranged under the at least one Domain object. The at least one Business Entity object includes at least one business name and at least one business contact. The at least one business contact includes at least one business address. The Web Services system includes a storage system for storing business information and accessible via the hierarchical directory.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the cited references. *See* M.P.E.P. § 2143.03. Applicants respectfully contend that neither *Crohn* nor *Gadbois*, alone or in combination, disclose, teach, or suggest each and every limitation of Claim 8. *Crohn* discloses an object model "organized in the form of a bolt." *Crohn*, col. 16, line 1. The Office Action relies on the objects of this bolt as disclosing the various objects disclosed by Claim 8. *Office Action*, pgs. 8-9. In particular, the Office Action relies on Clients collection object 912 and Client objects 914 as disclosing a User object and Business Entity object, respectively. *Office Action*, pg. 8. However, Claim 8 discloses that "the at least one User object identifies a user account for managing at least one Business Entity object." *Crohn* merely states that Clients collection object 912 (i.e. a User object) contains the one or more Client objects 914. *Crohn*, col. 16, lines 9-10. There is no disclosure, teaching, or suggestion in the cited portions of *Crohn* that this Clients collection object 912 (i.e. a User object) identifies a user account for managing at least on Business Entity object. *Gadbois* fails to cure this deficiency. Accordingly, Applicants respectfully submit that Claim 8 is allowable over the cited references.

Claims 9 and 10 each depend from Claim 8. Therefore, Applicants respectfully submit that Claims 9 and 10 are allowable over the cited references for at least the reasons discussed above with regard to Claim 8.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stand ready to conduct such a conference at the convenience of the Examiner.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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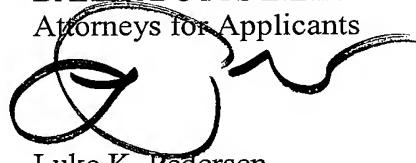
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